March 18, 2021

Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director

MEMO ENDORSED

The Application is granted.

VIA ECF

Honorable Paul G. Gardephe United States District Judge Southern District of New York 40 Foley Square New York, NY 10007 SO ORDERED:

Paul G. Gardephe, U.S.D.

Dated: March 19, 2021

Re: <u>United States of America v. Joseph Hoats</u>

19 Cr. 067 (PGG)

Dear Judge Gardephe,

I write, with no objection from Pretrial Services, to request a temporary modification of Mr. Hoats' conditions of release to allow him to travel to Athens, Tennessee to visit family. The Government defers to the recommendation of Pretrial Services.

As the Court will recall, Mr. Hoats moved to Illinois to live with his daughter and her husband in order to help care for their children, his grandchildren. He is supervised in the district of his residence and is in full compliance with his conditions of release.

With the Court's approval, Mr. Hoats will travel by car to Tennessee on March 29, 2021 with his daughter, her husband and their children and return on April 3, 2021. Mr. Hoats will provide his Pretrial Services Officer with the required travel documentation, accommodations information and itinerary.

Respectfully submitted,

/s/ Amy Gallicchio

Amy Gallicchio, Esq. Assistant Federal Defender (917) 612-3274

CC: AUSA Nicholas Chiuchiolo AUSA Jun Xiang John Moscato, Pretrial Services Supervisor